

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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|--------------------------|---|---------------------------------|
| IN RE: |) | Chapter 11 |
| |) | |
| W.R. GRACE & CO., et al. |) | |
| |) | |
| Debtors. |) | Case No. 01-01139 (JKF) |
| |) | (Jointly Administered) |
| |) | |
| |) | |
| |) | Related Docket No. 16149 |

**CLAIMANTS' FINAL WITNESS LIST FOR THE JULY 30-31, 2007 STATUTE
OF LIMITATIONS HEARING ON CERTAIN MOTLEY RICE CLAIMANTS'
ASBESTOS PROPERTY DAMAGE CLAIMS**

In accordance with this Court's June 25, 2007 Scheduling Order for Adjudication of Asbestos PD Claims on July 30-August 1, 2007 [Docket No. 16149], the claimants¹ hereby submit their final witness list for the July 30-31, 2007 Statute of Limitations Hearing on Certain Motley Rice Claimants Asbestos Property Damage Claims. Claimants have today included copies of the affidavits of Craig Watson, Keith Bloom and Fred Berlinsky as exhibits to the trial brief. Plaintiffs reserve the right to call the following witnesses by live testimony, by teleconference, or via declaration by affidavit:

1. Keith Bloom, Director of Construction Services and Quality Assurance with the Office of Capital Planning at Washington State University;
2. Russ Schaff, Liaison with Environmental Health Department at Washington State University;

¹ Claim No. 6939 (WSU-Kruegal), Claim No. 6940 (WSU-Johnson), Claim No. 6942 (WSU-Dana), Claim No. 6943 (WSU-Beasley), Claim No. 6944 (WSU-McCoy); Claim No. 6938 (Edmonds Community College); Claim No. 2977 (Cherry Hill Plaza); Claim Form No. 9645 (Port of Seattle-Main Terminal), Claim No. 9646 (Port of Seattle-North Satellite Bldg.), Claim No. 9647 (Port of Seattle-South Satellite Bldg.)

3. E.V. Davis, Director of Facilities Operations at Washington State University;
4. Chris Baylon, Industrial Hygienist at Washington State University;
5. Dwight Hagihara, Director of Environmental Health at Washington State University;
6. Rex Swartz, Asst. Safety Officer, Beasley Performing Arts Center, Washington State University
7. Jim Crow, Coliseum Director at Washington State University;
8. Bruce Benson, Department of Physical Plant, Washington State University
9. Paul Doherty, Director of Facilities Operations and Capital Projects at Edmonds Community College;
10. Craig Watson, General Counsel for Port of Seattle;
11. Thom Erwin, Operations and Maintenance Program Construction Manager for Port of Seattle;
12. Fred Berlinsky, owner of Cherry Hill Plaza.
13. R. Timothy Popp, Senior Environmental Project Manager who completed Phase I Environmental Site Assessment at CHP in November 1997.

In the event that Debtors object to the admission of any exhibits submitted by the Claimants, Claimants reserve the right to call one of more witnesses for the purpose of authenticating documents and/or laying foundation for their admission. Claimants further reserve the right to call witnesses in rebuttal to any evidence introduced by Debtors at the July 30-31, 2007 hearing. Debtors have failed to assert constructive notice in their trial brief. Should this be asserted, Claimants reserve the right to present fact witness and expert witnesses on this issue. Debtors have failed to identify experts to testify

concerning contamination at claimants' buildings. Should Debtors be permitted to call such experts or assert such position, claimants reserve the right to call rebuttal experts.

Mt. Pleasant, SC
July 16, 2007

Respectfully Submitted by:

JASPAN SCHLESINGER HOFFMAN LLP

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And

MOTLEY RICE LLC

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